

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,	*	
	*	
Plaintiff,	*	
v.	*	Civil Action No. 22-cv-02448-ELH
	*	
HUMPHREY-STAVROU ASSOCIATES INC.,	*	
et al.,	*	
	*	
Defendants.	*	

**CONSENT MOTION TO APPROVE AND ENTER PROPOSED CONSENT
ORDER**

Plaintiff United States of America moves the Court to approve the attached Proposed Consent Order resolving this litigation as to (a) Humphrey-Stavrou Associates, Inc. (“HSAI”); (b) Pin Oak Elderly Associates, LP; (c) Country View Elderly Associates, LP; and (d) Randolph Village Associates LP (collectively, “HSA Defendants”), and Rule 19 Defendants (a) Avanath Vista Lakes, LLC; (b) Avanath Largo Center, LLC; and (c) CDT SP Henson Creek, LLC (collectively, “Rule 19 Defendants,” and together with the HSA Defendants, “Defendants”) and to enter the Consent Order as the Judgment of the Court as to the Defendants. The grounds for this Motion are set forth in the attached Proposed Consent Order. The Defendants consent to this motion.

Dated: October 16, 2023

Respectfully submitted,

EREK L. BARRON
United States Attorney
District of Maryland

_____/s/_____
KIMBERLY S. PHILLIPS
Bar No. 811611
Assistant United States Attorney
36 S. Charles Street 4th Floor
Baltimore, Maryland 21201
Phone: (410) 209-4900
E-mail: Kimberly.Phillips@usdoj.gov

_____/s/_____
KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

_____/s/_____
CARRIE PAGNUCCO
Chief, Housing and Civil Enforcement Section

_____/s/_____
MICHAEL S. MAURER
Deputy Chief
BETH PEPPER
JENNIFER MCALLISTER
Trial Attorneys
Housing and Civil Enforcement Section
Civil Rights Division
U.S. Department of Justice
4 Constitution Square
150 M Street, N.E., Room 6.1423
Washington, DC 20002
Phone: (202) 305-0916
Fax: (202) 514-1116
E-mail: Beth.Pepper@usdoj.gov
E-mail: Jennifer.Mcallister@usdoj.gov

*Attorneys for Plaintiff
United States of America*

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2023, I caused the foregoing Consent Motion to Approve and Enter Proposed Consent Order to be served on counsel for the Defendants via electronic mail at the following address:

- Christine Walz
Lynn Calkins
Holland & Knight LLP
Christine.walz@hklaw.com
Lynn.Calkins@hklaw.com
- Harry Kelly
Nixon Peabody LLP
hkelly@nixonpeabody.com
- Joshua Drian
Andrew Zimmitti
Manatt, Phelps & Phillips, LLP
jdrian@manatt.com
azimmitti@manatt.com

_____/s/_____
Kimberly S. Phillips
Assistant U.S. Attorney